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510(k) Summary Bionx Implants Inc. SmartScrew™

Submitter's Name, Address, Telephone Number, and Contact Person

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Date prepared:

September 19, 2000

Name of the device:

A. Trade or Proprietary Name: SmartScrewTM

B. Common Name:

Bioabsorbable, Threaded, Fixation Rod

C. Classification Name:

Biodegradable fixation fastener, bone

D. Device Product Code:

HWC

Predicate Devices:

Bionx Implants Inc. Biofix® Bioabsorbable SR-PLLA Threaded Fixation Rod (K952471)

Bionx Implants Inc. Biofix® Bioabsorbable, Threaded, Distal Radius Screw (K974876)

Bionx Implants Inc. SmartScrew™ (K992947)

Bionx Implants Inc. Biofix® SR-PGA Pin (K890902)

Bionx Implants Inc. Biofix® SR-PGA Screw™ (K920188)

Bionx Implants Inc. SmartPinTM (K925098) Bionx Implants Inc. SmartNailTM (K993074) Bionx Implants Inc. PLGA Pin (K003659) Johnson & Johnson Orthosorb® Pin (K864912, K901456)

Intended Use:

The SmartScrewTM is generally intended for maintenance of alignment and fixation of fractures, osteotomies, arthrodeses or condylar grafts within the condylar aspects of the upper extremity, ankle and foot, in the presence of appropriate brace and/or immobilization. Specifically, it is intended for phalangeal fractures, metacarpal fractures, carpal fusion and fractures, wrist arthrodesis, distal radius fractures, olecranon fractures, radial head fractures, humeral condylar fractures, cancellous fractures and osteotomies of the malleolus, ankle fractures, metatarsal osteotomies, and correction of hallux valgus.

The SmartScrew™ is not intended for use in and is contraindicated for: 1) Fractures and osteotomies of cortical bone (except those in the hand and foot) and proximal femoral fractures, 2) Situations where internal fixation is otherwise contraindicated, e.g., active or potential infection and where patient co-operation cannot be guaranteed (e.g. alcoholism).

Device Description:

The SmartScrewTM is composed of 100% poly-L-lactide ("PLLA") polymer. It is supplied with diameters 2.0mm – 6.3mm and lengths 6 - 110mm. Cannulated model is provided with diameter 4.5 mm.

Substantial Equivalence:

The SmartScrew[™] has the following similarities to the Bionx Implants Biofix® Bioabsorbable SR-PLLA Threaded Fixation Rod (K952471), Biofix® Bioabsorbable, Threaded, Distal Radius Screw (K974876), Cannulated SmartScrew[™] (K992947):

- use the same operating principle
- incorporate the same basic design
- incorporate the same raw material
- has the same shelf life
- are packaged and sterilized using the same materials and processes
- use the same manufacturing process
- is used with the same instrument set

The SmartScrew[™] has the following similarities to the Johnson & Johnson Orthosorb® Pin (K864912, K901456):

- use the similar operating principle
- is indicated for the similar indications

The predicate devices are the Bionx Implants Inc. SmartScrew™ (K952471, K974876, K992947), Biofix® SR-PGA Pin (K890902), Biofix® SR-PGA Screw™ (K920188), SmartPin™ (K925098), SmartNail™ (K993074) and PLGA Pin (K003659). These devices have very similar principles of operation and technological characteristics. Furthermore, the minor technological differences between the SmartScrew™ and the predicate device do not raise any new issues of safety or effectiveness.

In summary, the SmartScrewTM described in this notification is, in our opinion, substantially equivalent to the predicate devices. Furthermore, the minor technological differences between the SmartScrewTM and the predicate devices do not raise any new issues of safety or effectiveness.





APR 2 6 2001

Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

Mr. Gerard S. Carlozzi
President and CEO
Bionx Implant, Inc.
1777 Sentry Parkway West
Gwynedd Hall, Suite 400
Bluebell, Pennsylvania 19422

Re: K003077

Trade Name: SmartScrew™ Regulation Number: 888.3040

Regulatory Class: II

Product Code: HWC and MAI Dated: January 24, 2001

Received: January 24, 2001

Dear Mr. Carlozzi:

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the current Good Manufacturing Practice requirement, as set forth in the Quality System Regulation (QS) for Medical Devices: General regulation (21 CFR Part 820) and that, through periodic (QS) inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4659. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or at (301) 443-6597, or at its Internet address "http://www.fda.gov/cdrh/dsmamain.html".

Sincerely yours,
Mulhurson

Celia M. Witten, Ph.D., M.D.

Director

Division of General, Restorative and

Neurological Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

INDICATIONS FOR USE

510(K) Number (if known): <u>k003077</u>

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Device Name:	SmartScrew TM
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Please do not write below this line – continue on another page is needed) Concurrence of CDRH, Office of Device Evaluation (ODE)	
Prescription Use X (Per 21 CFR 801.109)	OR Over-The-Counter Use
	(Division Sign-Off) Division of General, Restorative and Neurological Devices 510(k) Number KOO3077